May 30, 2002

Mr. Joe Virgil
Levy Company
P.O. Box 540
Burns Harbor, Indiana 46368

Re: Significant Source Modification No:
127-15319-00026

Dear Mr. Virgil:

Levy Company applied for a Part 70 operating permit on December 6, 1996 for a separation plant. An application to modify the source was received on December 20, 2001. Pursuant to 326 IAC 2-7-10.5 the following emission units are approved for construction at the source:

One Finishing plant, processing blast furnace slag, controlled by water suppression, consisting of the following pieces of equipment:

(a) Two Syntron Feeders, with a capacity of 250 tons per hour;
(b) One 36 inch conveyor (B), with a capacity of 250 tons per hour;
(c) One 36 inch conveyor (A), with a capacity of 250 tons per hour;
(d) One 6 foot by 16 foot SD Screen, with a capacity of 250 tons per hour;
(e) One 30 inch by 100 foot Stacker conveyor (C), with a capacity of 48 tons per hour;
(f) One 36 inch conveyor (D), with a capacity of 250 tons per hour;
(g) One 30 inch conveyor (E), with a capacity of 250 tons per hour;
(h) One 8 foot by 20 foot TD Screen, with a capacity of 250 tons per hour;
(i) One 60 inch conveyor (F), with a capacity of 110 tons per hour;
(j) One 30 inch conveyor (G), with a capacity of 110 tons per hour;
(k) One 30 inch conveyor (H), with a capacity of 50 tons per hour;
(l) One 5 foot by 12 foot horizontal screen, with a capacity of 50 tons per hour;
(m) One 24 inch by 150 foot radial stack conveyor (S4), with a capacity of 110 tons per hour;
(n) One 24 inch by 100 foot radial stack conveyor (S5), with a capacity of 50 tons per hour;
(o) One 30 inch conveyor (I), with a capacity of 200 tons per hour;
(p) One 24 inch by 150 foot radial stack conveyor (S3), with a capacity of 200 tons per hour;
(q) One 30 inch conveyor (J), with a capacity of 113 tons per hour;
(r) One 24 inch conveyor (K), with a capacity of 113 tons per hour;
(s) One 24 inch by 100 foot radial stack conveyor (S2), with a capacity of 113 tons per hour;
(t) One barge hopper (BH-1); and
(u) One barge stacker (BS-1).

The proposed Significant Source Modification approval will be incorporated into the pending Part 70 permit application pursuant to 326 IAC 2-7-10.5(l)(3). If there are no changes to the proposed construction of the emission units, the source may begin operating on the date that IDEM receives an affidavit of construction pursuant to 326 IAC 2-7-10.5(h). If there are any changes to the proposed construction the source can not operate until an Operation Permit Validation Letter is issued.

Pursuant to Contract No. A305-0-00-36, IDEM, OAQ has assigned the processing of this application to Eastern Research Group, Inc., (ERG). Therefore, questions should be directed to Mike Pring, ERG,1600 Perimeter Park Drive, Morrisville, North Carolina 27560, or call (919) 468-7840 to speak directly to Mr. Pring. Questions may also be directed to Duane Van Laningham at IDEM, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call (800) 451-6027, press 0 and ask for Duane Van Laningham, or extension 3-6878, or dial (317) 233-6878.

Sincerely,

Original Signed by Paul Dubenetzky
Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments

ERG/MP

cc: File - Porter County
U.S. EPA, Region V
Porter County Health Department
Northwest Regional Office
Air Compliance Section Inspector - Dave Sampias
Compliance Data Section - Karen Nowak
Administrative and Development - Sara Cloe
Technical Support and Modeling - Michele Boner
File - Title V 127-7656-00026
Air Permits Branch - Melissa Groch

PART 70 SIGNIFICANT SOURCE MODIFICATION
OFFICE OF AIR QUALITY

Levy Company - A Contractor of Bethlehem Steel Corporation
U.S. Highway 12
Burns Harbor, Indiana 46368

(herein known as the Permittee) is hereby authorized to construct and operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this approval.

This approval is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Source Modification No.: 127-15319-00026	
Issued by: Original Signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: May 30, 2002

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SECTION A SOURCE SUMMARY

This approval is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the emission units contained in conditions A.1 through A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this approval pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary blast furnace slag separation plant.

Responsible Official:	Ray Nierman
Source Address:	U.S. Highway 12, Burns Harbor, Indiana 46368
Mailing Address:	P.O. Box 540, Portage, Indiana 46368
General Source Phone Number:	(219) 787-8563
SIC Code:	3295
County Location:	Porter
Source Location Status:	Nonattainment for ozone Attainment for all other criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD or Emission Offset Rules

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source is approved to construct and operate the following emission units and pollution control devices:

One Finishing plant, processing blast furnace slag, controlled by water suppression, consisting of the following pieces of equipment:

(a) Two Syntron Feeders, with a capacity of 250 tons per hour;
(b) One 36 inch conveyor (B), with a capacity of 250 tons per hour;
(c) One 36 inch conveyor (A), with a capacity of 250 tons per hour;
(d) One 6 foot by 16 foot SD Screen, with a capacity of 250 tons per hour;
(e) One 30 inch by 100 foot Stacker conveyor (C), with a capacity of 48 tons per hour;
(f) One 36 inch conveyor (D), with a capacity of 250 tons per hour;
(g) One 30 inch conveyor (E), with a capacity of 250 tons per hour;
(h) One 8 foot by 20 foot TD Screen, with a capacity of 250 tons per hour;
(i) One 60 inch conveyor (F), with a capacity of 110 tons per hour;
(j) One 30 inch conveyor (G), with a capacity of 110 tons per hour;
(k) One 30 inch conveyor (H), with a capacity of 50 tons per hour;
(l) One 5 foot by 12 foot horizontal screen, with a capacity of 50 tons per hour;
(m) One 24 inch by 150 foot radial stack conveyor (S4), with a capacity of 110 tons per hour;
(n) One 24 inch by 100 foot radial stack conveyor (S5), with a capacity of 50 tons per hour;
(o) One 30 inch conveyor (I), with a capacity of 200 tons per hour;
(p) One 24 inch by 150 foot radial stack conveyor (S3), with a capacity of 200 tons per hour;
(q) One 30 inch conveyor (J), with a capacity of 113 tons per hour;
(r) One 24 inch conveyor (K), with a capacity of 113 tons per hour;

(s) One 24 inch by 100 foot radial stack conveyor (S2), with a capacity of 113 tons per hour;

(t) One barge hopper (BH-1); and

(u) One barge stacker (BS-1).

A.3 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

A.4 Part 70 Source Definition 326 IAC 2-7-1(22)]

This steel manufacturing plant consists of a source with an on-site contractor:

(a) Bethlehem Steel Corporation owns and operates the steel plant, located on U.S. Highway 12, Burns Harbor, Indiana; and

(b) Levy Company (a contractor to Bethlehem Steel Corporation) owns and operates a slag separation facility located on U.S. Highway 12, Burns Harbor, Indiana.

IDEM has determined that Bethlehem Steel Corporation and the Levy Company facility located at the Burns Harbor plant are a single source under 326 IAC 2-7. These two plants are considered one source because the separation facility is located on Bethlehem Steel Corporations property and will use slag produced by Bethlehem Steel Corporation as its only source of raw material.

SECTION B GENERAL CONSTRUCTION CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

B.3 Revocation of Permits [326 IAC 2-1.1-9(5)][326 IAC 2-7-10.5(i)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

B.4 Significant Source Modification [326 IAC 2-7-10.5(h)]

This document shall also become the approval to operate pursuant to 326 IAC 2-7-10.5(h) when, prior to start of operation, the following requirements are met:

(a) The attached affidavit of construction shall be submitted to the Office of Air Quality (OAQ), Permit Administration & Development Section, verifying that the emission units were constructed as proposed in the application. The emissions units covered in the Significant Source Modification approval may begin operating on the date the affidavit of construction is postmarked or hand delivered to IDEM if constructed as proposed.

(b) If actual construction of the emissions units differs from the construction proposed in the application, the source may not begin operation until the source modification has been revised pursuant to 326 IAC 2-7-11 or 326 IAC 2-7-12 and an Operation Permit Validation Letter is issued.

(c) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.

(d) The Permittee shall receive an Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section and attach it to this document.

(e) In the event that the Part 70 application is being processed at the same time as this application, the following additional procedures shall be followed for obtaining the right to operate:

(1) If the Part 70 draft permit has not gone on public notice, then the change/addition covered by the Significant Source Modification will be included in the Part 70 draft.

(2) If the Part 70 permit has gone through final EPA proposal and would be issued ahead of the Significant Source Modification, the Significant Source Modification will go through a concurrent 45 day EPA review. Then the Significant Source Modification will be incorporated into the final Part 70 permit at the time of issuance.

(3) If the Part 70 permit has gone through public notice, but has not gone through final EPA review and would be issued after the Significant Source Modification is

issued, then the Modification would be added to the proposed Part 70 permit, and the Title V permit will issued after EPA review.

SECTION C GENERAL OPERATION CONDITIONS

C.1 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.

(c) A responsible official is defined at 326 IAC 2-7-1(34).

C.2 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) when operation begins, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The PMP and the PMP extension notification do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to

the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

C.3 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

C.4 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

Compliance Requirements [326 IAC 2-1.1-11]

C.7 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.8 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

If required by Section D, all monitoring and record keeping requirements shall be implemented when operation begins. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.9 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:

(1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.

(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:

(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or

(2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.

(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.

(4) Failure to take reasonable response steps shall constitute a violation of the permit.

(c) The Permittee is not required to take any further response steps for any of the following reasons:

(1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously

submitted a request for a minor permit modification to the permit, and such request has not been denied.

(3) An automatic measurement was taken when the process was not operating.

(4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.

(d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.

(e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

(f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.10 Emergency Provisions [326 IAC 2-7-16]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, and the Northwest Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967
Telephone Number: 219-881-6712 (Northwest Regional Office)

(5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

(g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

C.11 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.12 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

(a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.13 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

(a) The reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(c) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(d) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

One Finishing plant, processing blast furnace slag, controlled by water suppression, consisting of the following pieces of equipment:

(a) Two Syntron Feeders, with a capacity of 250 tons per hour;
(b) One 36 inch conveyor (B), with a capacity of 250 tons per hour;
(c) One 36 inch conveyor (A), with a capacity of 250 tons per hour;
(d) One 6 foot by 16 foot SD Screen, with a capacity of 250 tons per hour;
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(j) One 30 inch conveyor (G), with a capacity of 110 tons per hour;
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(o) One 30 inch conveyor (I), with a capacity of 200 tons per hour;
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(q) One 30 inch conveyor (J), with a capacity of 113 tons per hour;
(r) One 24 inch conveyor (K), with a capacity of 113 tons per hour;
(s) One 24 inch by 100 foot radial stack conveyor (S2), with a capacity of 113 tons per hour;
(t) One barge hopper (BH-1); and
(u) One barge stacker (BS-1).

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

D.1.1 Particulate Matter (PM) 326 IAC 6-3-2)

Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from the finishing plant unit operations shall be limited to the levels indicated below when operating at the process weight rate indicated:

Process	Throughput Rate (tons/hr)	Emission Limit (pounds per hour)
Two Syntron Feeders	250	61
Conveyor B	250	61
Conveyor A	250	61
SD Screen	250	61
Stacker Conveyor C	48	44
Conveyor D	250	61
Conveyor E	250	61
TD Screen	250	61
Conveyor F	110	52
Conveyor G	110	52
Conveyor H	50	45
SD Horizontal Screen	50	45
Radial Stacker S4	110	52
Radial Stacker S5	50	45

Process	Throughput Rate (tons/hr)	Emission Limit (pounds per hour)
Conveyor I	200	59
Radial Stacker S3	200	59
Conveyor J	113	53
Conveyor K	113	53
Radial Stacker S2	113	53
Barge Hopper BH-1	500	122
Barge Stacker BS-1	500	122

The pounds per hour limitations above were calculated with the following equation::

$E = 55\ P^{0.11} - 40$ where E = rate of emission in pounds per hour and P = process weight rate in tons per hour

D.1.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

(a) Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration), the allowable PM and PM-10 emission rate from the finishing plant unit operations shall not exceed the values indicated below:

Process	Emission Limit (lb/ton)	
	PM	PM10
Two Syntron Feeders	0.0001008	0.000048
Conveyor B	0.0001008	0.000048
Conveyor A	0.0001008	0.000048
SD Screen	0.001764	0.00084
Stacker Conveyor C	0.0001008	0.000048
Conveyor D	0.0001008	0.000048
Conveyor E	0.0001008	0.000048
TD Screen	0.001764	0.00084
Conveyor F	0.0001008	0.000048
Conveyor G	0.0001008	0.000048
Conveyor H	0.0001008	0.000048
SD Horizontal Screen	0.001764	0.00084
Radial Stacker S4	0.0001008	0.000048
Radial Stacker S5	0.0001008	0.000048
Conveyor I	0.0001008	0.000048
Radial Stacker S3	0.0001008	0.000048
Conveyor J	0.0001008	0.000048
Conveyor K	0.0001008	0.000048
Radial Stacker S2	0.0001008	0.000048
Barge Hopper BH-1	0.0001008	0.000048
Barge Stacker BS-1	0.0001008	0.000048

These limits will limit emissions to less than 15 tons per year of PM and PM10 from the finishing plant. Therefore, 326 IAC 2-2 (Prevention of Significant Deterioration) does not apply to this modification.

Compliance Determination Requirements

D.1.3 Particulate Matter (PM and PM-10)

The Permittee shall use wet suppression to control emissions of PM and PM_{10} from the conveyors, screens, feeders, hoppers, and stackers at all times these emission units are in operation. The suppressant shall be applied in a manner and at a frequency sufficient to ensure compliance with 326 IAC 6-3 and 326 IAC 2-2. If weather conditions preclude the use of wet suppression, the permittee shall perform chemical analysis on the slag material to ensure it has a moisture content greater than 2.0 percent.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.4 Visible Emissions Notations

(a) Visible emission notations of the finishing operations shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.5 Record Keeping Requirements

(a) To document compliance with Condition D.1.2 and D.1.3, the Permittee shall maintain records of daily visible emission notations of the finishing operation.

(b) To document compliance with Condition D.1.2 (b),the Permittee shall maintain records of the chemical analysis of the slag material, as needed.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements of this permit.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

PART 70 SOURCE MODIFICATION CERTIFICATION

Source Name: Levy Company
Source Address: U.S. High 12, Burns Harbor, Indiana 46368
Mailing Address: P.O. Box 540, Portage, Indiana 46368
Source Modification No.: 127-15319-00026

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this approval.

Please check what document is being certified:

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Affidavit (specify) _____

9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the
Technical Support Document for a Part 70 Significant Source Modification

Source Name:	Levy Company - A Contractor of Bethlehem Steel Corporation
Source Location:	U.S. Highway 12, Burns Harbor, Indiana 46368
County:	Porter
SIC Code:	3295
Operation Permit No.:	127-7656-00026
Permit Reviewer:	ERG/MP

On April 23, 2002, the Office of Air Quality (OAQ) had a notice published in the Vidette Times, Munster, Indiana, stating that Levy Company had applied for a Part 70 Significant Source Modification relating to the construction of a finishing plant. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On May 21, 2002, Bethlehem Steel Corporation submitted comments on the proposed Part 70 permit. The summary of the comment is as follows:

Comment: Bethlehem Steel objects to the inclusion of the Levy Company finishing plant with the Bethlehem Steel Part 70 source. Bethlehem Steel does not feel that the Levy Company "supports" the Bethlehem Steel operation, and that Bethlehem Steel does not exercise "control" over Levy Company.

Response: IDEM has determined that the Levy Company finishing plant is considered as one source with Bethlehem Steel. These two plants are one source because (1) Levy Company obtains all their raw material (blast furnace slag) on-site from Bethlehem Steel Corporation, and (2) Levy Company is located on property contiguous to Bethlehem Steel. Therefore, there is no change in the proposed permit.

For clarification purposes, the finishing plant will be incorporated in the Levy's Title V (127-7656-00026) not to the Bethlehem Steel TV (127-6301-00078).

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a
Part 70 Significant Source Modification

Source Background and Description

Source Name:	Levy Company - A Contractor of Bethlehem Steel Corporation
Source Location:	U.S. Highway 12, Burns Harbor, Indiana 46368
County:	Porter
SIC Code:	3295
Operation Permit No.:	127-7656-00026
Operation Permit Issuance Date:	(not yet issued)
Significant Source Modification No.:	127-15319-00026
Permit Reviewer:	ERG/MP

The Office of Air Quality (OAQ) has reviewed a modification application from Levy Company relating to the construction of the following emission units and pollution control devices:

One Finishing plant, processing blast furnace slag, controlled by water suppression, consisting of the following pieces of equipment:

(a) Two Syntron Feeders, with a capacity of 250 tons per hour;
(b) One 36 inch conveyor (B), with a capacity of 250 tons per hour;
(c) One 36 inch conveyor (A), with a capacity of 250 tons per hour;
(d) One 6 foot by 16 foot SD Screen, with a capacity of 250 tons per hour;
(e) One 30 inch by 100 foot Stacker conveyor (C), with a capacity of 48 tons per hour;
(f) One 36 inch conveyor (D), with a capacity of 250 tons per hour;
(g) One 30 inch conveyor (E), with a capacity of 250 tons per hour;
(h) One 8 foot by 20 foot TD Screen, with a capacity of 250 tons per hour;
(i) One 60 inch conveyor (F), with a capacity of 110 tons per hour;
(j) One 30 inch conveyor (G), with a capacity of 110 tons per hour;
(k) One 30 inch conveyor (H), with a capacity of 50 tons per hour;
(l) One 5 foot by 12 foot horizontal screen, with a capacity of 50 tons per hour;
(m) One 24 inch by 150 foot radial stack conveyor (S4), with a capacity of 110 tons per hour;
(n) One 24 inch by 100 foot radial stack conveyor (S5), with a capacity of 50 tons per hour;
(o) One 30 inch conveyor (I), with a capacity of 200 tons per hour;
(p) One 24 inch by 150 foot radial stack conveyor (S3), with a capacity of 200 tons per hour;
(q) One 30 inch conveyor (J), with a capacity of 113 tons per hour;
(r) One 24 inch conveyor (K), with a capacity of 113 tons per hour;
(s) One 24 inch by 100 foot radial stack conveyor (S2), with a capacity of 113 tons per hour;

(t) One barge hopper (BH-1); and

(u) One barge stacker (BS-1).

History

On December 20, 2001, Levy Company (a contractor to Bethlehem Steel Corporation) submitted an application to the OAQ requesting to add a new finishing operation to their existing plant. Levy Company applied for a Part 70 permit on December 6, 1996.

Bethlehem Steel currently has another source modification under review (127-144517-00026) which deals with scarfing operations. The new scarfing equipment will be operated by Indiana Flame (a sub-contractor to Bethlehem Steel), who will be taking over scarfing operations from Bethlehem Steel. The finishing plant equipment will be used to handle and process blast furnace slag (a waste product) from Bethlehem Steel. The addition of finishing equipment will have no affect on the amount of scarfing, or on the amount of steel being produced at Bethlehem Steel. Therefore, IDEM has determined that these two source modifications (127-14517-0026 and 127-15319-00026) are considered separate projects for purposes of PSD review.

Source Definition

This steel manufacturing facility consists of a source with an on-site contractor:

(a) Bethlehem Steel Corporation owns and operates the steel plant, located at U.S. Highway 12, Burns Harbor, Indiana; and

(b) Levy Company owns and operates a slag separation facility located at U.S. Highway 12, Burns Harbor, Indiana.

IDEM has determined that Bethlehem Steel Corporation and the Levy Company facility located at the Burns Harbor plan are one source under 326 IAC 2-7. These two plants are considered one source due to the fact that Levy Company obtains all their raw material (blast furnace slag) on-site from Bethlehem Steel Corporation. Therefore, the term “source” in the Part 70 documents refers to both Bethlehem Steel Corporation and Levy Company as one source.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 Significant Source Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on December 20, 2001.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (Page 1).

Potential To Emit of Modification

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	120.5
PM-10	57.4
SO_2	--
VOC	–
CO	--
NO_x	–

Justification for Modification

The Part 70 Operating permit is being modified through a Part 70 Significant Source Modification. This modification is being performed pursuant to 326 IAC 2-7-10.5(f)(4)(A) as the potential to emit PM and PM10 is greater than twenty-five (25) tons per year.

County Attainment Status

The source is located in Porter County.

Pollutant	Status
PM-10	attainment
SO_2	attainment
NO_2	attainment
Ozone	severe nonattainment
CO	attainment
Lead	attainment

(a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Porter County has been designated as nonattainment for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.

(b) Porter County has been classified as attainment or unclassifiable for all other pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Source Status

Existing Source PSD or Emission Offset Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	2,586
PM-10	2,586
SO_2	7,515
VOC	979
CO	241,801
NOx	10,372

(a) This existing source is a major stationary source because an attainment regulated pollutant is emitted at a rate of 100 tons per year or more, and it is one of the 28 listed source categories.

(b) These emissions are based upon the Technical Support Document for the construction permit CP-127-4478-00001, issued to Bethlehem Steel Corporation, issued on September 15, 1995. The PSD status of the Levy Company is based on the PSD status of Bethlehem Steel Corporation because they are considered one source.

Potential to Emit of Modification After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 source modification.

	Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO_2	VOC	CO	NO_X	HAPs
Finishing plant	5.78	2.75	--	--	--	--	--
PSD/Emission Offset Significant Level	25	15	40	40	100	40	NA

This modification to an existing major nary source is not major because the emission increase is less than the emission offset significant levels. Therefore, pursuant to 326 IAC 2-2, 326 IAC 2-3, and 40 CFR 52.21, the PSD and emission offset requirements do not apply.

Federal Rule Applicability

(a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source. 40 CFR Part 60, Subpart OOO is not applicable to slag processing operations, because the original ore is expanded and vitrified in a furnace which alters the physical and chemical makeup of the ore producing a slag by-product that does not meet the definition of a nonmetallic mineral in 40 CFR Subpart 60.671.

(b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 6-3-2 (Process Operations)

Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from the finishing plant unit operations shall be limited to the levels indicated below when operating at the process weight rate indicated:

Process	Throughput Rate (tons/hr)	Emission Limit (pounds per hour)
Two Syntron Feeders	250	61
Conveyor B	250	61
Conveyor A	250	61
SD Screen	250	61
Stacker Conveyor C	48	44
Conveyor D	250	61
Conveyor E	250	61
TD Screen	250	61
Conveyor F	110	52
Conveyor G	110	52
Conveyor H	50	45
SD Horizontal Screen	50	45
Radial Stacker S4	110	52
Radial Stacker S5	50	45
Conveyor I	200	59
Radial Stacker S3	200	59
Conveyor J	113	53
Conveyor K	113	53
Radial Stacker S2	113	53
Barge Hopper BH-1	500	122
Barge Stacker BS-1	500	122
Radial Stacker S2	113	53

The pounds per hour limitations above were calculated with the following equation::

$E = 55 P^{0.11} - 40$ where E = rate of emission in pounds per hour and P = process weight rate in tons per hour

Compliance with these limits is established through the use of the controlled emission factors for crushed stone processing found in Table 11.19.2-2 of AP-42 (1/95). No testing of these units is

required as there is no stack, and uncontrolled emissions from each unit are less than 10 pounds per hour.

326 IAC 2-2 (Prevention of Significant Deterioration)

The allowable PM and PM-10 emission rate from the finishing plant unit operations shall not exceed the values indicated below:

Process	Emission Limit (lb/ton)	
	PM	PM10
Two Syntron Feeders	0.0001008	0.000048
Conveyor B	0.0001008	0.000048
Conveyor A	0.0001008	0.000048
SD Screen	0.001764	0.00084
Stacker Conveyor C	0.0001008	0.000048
Conveyor D	0.0001008	0.000048
Conveyor E	0.0001008	0.000048
TD Screen	0.001764	0.00084
Conveyor F	0.0001008	0.000048
Conveyor G	0.0001008	0.000048
Conveyor H	0.0001008	0.000048
SD Horizontal Screen	0.001764	0.00084
Radial Stacker S4	0.0001008	0.000048
Radial Stacker S5	0.0001008	0.000048
Conveyor I	0.0001008	0.000048
Radial Stacker S3	0.0001008	0.000048
Conveyor J	0.0001008	0.000048
Conveyor K	0.0001008	0.000048
Radial Stacker S2	0.0001008	0.000048
Barge Hopper BH-1	0.0001008	0.000048
Barge Stacker BS-1	0.0001008	0.000048

These limits will limit emissions to less than 15 tons per year of PM and PM10. Therefore, 326 IAC 2-2 (Prevention of Significant Deterioration) does not apply to this modification. These limits are based on AP-42 emission factors for controlled processes (wet suppression). Compliance with these limits will be established through the use of wet suppression (weather permitting), and the visible emissions notations. When weather conditions preclude the use of wet suppression, the source will be required to perform chemical analysis of the slag material to ensure it has a moisture content greater than 2.0 percent. The 2.0 percent value is near the upper range of the study group used to develop the controlled AP-42 emission factors (0.55 to 2.88 percent), and historically, the moisture content of the slag material at Levy company has been between 3 and 6 percent.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as

grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

Conclusion

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Source Modification No. 127-15319-00026.

Appendix A: Emissions Calculations
Crushed Stone Processing

Company Name: **Levy Company**
Address City IN Zip: **US Highway 12**
CP: **127-15319**
Plt ID: **127-00026**
Reviewer: ERG/MP
Date: 1/24/02

	Throughput Rate (tons/hr)	Emission Factor (lb/ton)				Emissions (tons/year)			
		PM* Uncontrolled	PM10* Uncontrolled	PM* Controlled	PM10* Controlled	PM* PTE	PM10* PTE	PM* Controlled	PM10* Controlled
Process									
Two Syntron Feeders	250	0.00294	0.0014	0.0001008	0.000048	3.219	1.533	0.110	0.053
Conveyor B	250	0.00294	0.0014	0.0001008	0.000048	3.219	1.533	0.110	0.053
Conveyor A	250	0.00294	0.0014	0.0001008	0.000048	3.219	1.533	0.110	0.053
SD Screen	250	0.0315	0.015	0.001764	0.00084	34.493	16.425	1.932	0.920
Stacker Conveyor C	48	0.00294	0.0014	0.0001008	0.000048	0.618	0.294	0.021	0.010
Conveyor D	250	0.00294	0.0014	0.0001008	0.000048	3.219	1.533	0.110	0.053
Conveyor E	250	0.00294	0.0014	0.0001008	0.000048	3.219	1.533	0.110	0.053
TD Screen	250	0.0315	0.015	0.001764	0.00084	34.493	16.425	1.932	0.920
Conveyor F	110	0.00294	0.0014	0.0001008	0.000048	1.416	0.675	0.049	0.023
Conveyor G	110	0.00294	0.0014	0.0001008	0.000048	1.416	0.675	0.049	0.023
Conveyor H	50	0.00294	0.0014	0.0001008	0.000048	0.644	0.307	0.022	0.011
SD Horizontal Screen	50	0.0315	0.015	0.001764	0.00084	6.899	3.285	0.386	0.184
Radial Stacker S4	110	0.00294	0.0014	0.0001008	0.000048	1.416	0.675	0.049	0.023
Radial Stacker S5	50	0.00294	0.0014	0.0001008	0.000048	0.644	0.307	0.022	0.011
Conveyor I	200	0.00294	0.0014	0.0001008	0.000048	2.575	1.226	0.088	0.042
Radial Stacker S3	200	0.00294	0.0014	0.0001008	0.000048	2.575	1.226	0.088	0.042
Conveyor J	113	0.00294	0.0014	0.0001008	0.000048	1.455	0.693	0.050	0.024
Conveyor K	113	0.00294	0.0014	0.0001008	0.000048	1.455	0.693	0.050	0.024
Radial Stacker S2	113	0.00294	0.0014	0.0001008	0.000048	1.455	0.693	0.050	0.024
Barge Stacker BS-1	500	0.00294	0.0014	0.0001008	0.000048	6.439	3.066	0.221	0.105
Barge Hopper BH-1	500	0.00294	0.0014	0.0001008	0.000048	6.439	3.066	0.221	0.105
TOTAL						**120.529**	**57.395**	**5.780**	**2.752**

*PM-10 emission factors from AP-42 Table 11.19.2-2. PM emission factors are not provided in AP-42, but guidance is provided to estimate TSP emissions by multiplying the PM-10 emission factor by 2.1. Controlled factors reflects water suppression.

Methodology

Emission (tons/yr) = Throughput (tons/hr) x Emission Factor (lb/ton)*8,760(hr/yr)/2,000 lb/ton